

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

MAR 18 2020

David J. Bradley, Clerk

United States of America

v.

Hugo Cristobal Garza-Ornelas (1984/MX)

Case No. 11-20-0753-MDefendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 17, 2020 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 USC § 841

Possession of a Controlled Substance with Intent to Distribute /  
Approximately 41.42 Kilograms of Cocaine, a Schedule II Controlled  
Substance.

21 USC § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance /  
Approximately 41.42 Kilograms of Cocaine, a Schedule II Controlled  
Substance.

This criminal complaint is based on these facts:

See Attachment "A"

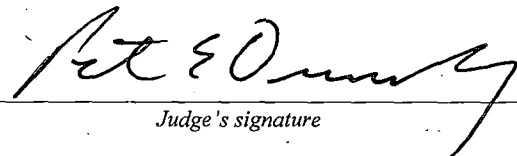
☒ Continued on the attached sheet.Approved AUSA McL. Mittle  
3/18/20

Complainant's signature

Jorge Rodriguez, HSI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/18/20208:27 am

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter E. Ormsby

Printed name and title

**Attachment "A"**

I, Jorge Rodriguez, am a Task Force Officer of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On March 17, 2020, as part of an ongoing investigation Homeland Security Investigations in McAllen, Texas, (HSI McAllen) observed a suspected load vehicle and initiated surveillance. During surveillance HSI Task Force Officers noticed the suspect load vehicle being abandoned by the driver in McAllen, Texas. The driver then proceeded to run from the vehicle and fled on foot. HSI Task Force Officers detained Hugo Cristobal Garza Ornelas (herein known as Garza) as he was fleeing from the vehicle.
2. During a consent search of the vehicle, a McAllen Police Department Canine Unit conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the vehicle.
3. HSI Task Force Officers with the assistance of Customs and Border Protection Officers at the Hidalgo Port of Entry conducted a non-intrusive X-Ray inspection and discovered anomalies in the rear floor of the vehicle.
4. A physical search of the vehicle revealed a total of 12 packages concealed within the floor of the vehicle. The 12 packages weighed approximately 14.68 kilograms on a calibrated scale. Task Force Officers field tested the substance inside the packages, with a presumptive positive result for the properties and characteristics of cocaine.
5. HSI Special Agents and a Task Force Officers conducted a consent search at the residence of Garza located at 1301 Shasta Ave in McAllen, Texas.
6. During a consent search of the residence, a McAllen Police Department Canine Unit conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from a dresser in the residence.
7. A physical search of the dresser revealed a total of 22 packages concealed in a false wall. The packages weighed approximately 26.74 kilograms of cocaine. The substance inside the packages with a presumptive positive result for the properties and characteristics of cocaine.
8. HSI Task Force Officers interviewed Garza who admitted to picking up the suspected load vehicle with the intentions of extracting the narcotics. Garza also admitted to knowing there were narcotics hidden in the residence.